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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN A. NIEMEYER, Individually and as the Representative of the Estate Of ANTHONY NIEMEYER, MARK NIEMEYER, JESSICA NIEMEYER, and REBECCA NIEMEYER Plaintiff, vs. FORD MOTOR COMPANY, a Delaware THE HERTZ CORPORATION; a Delaware corporation; HERTZ RENT-A-CAR, a corporation, AUTOLIV ASP, INC., a Missouri Corporation; MORTON INTERNATIONAL, INC., DOES I through XX; ROES I through XX; MOES I through XX; and POES I Through XX, inclusive, Defendants.	CASE NO.: 2:09-cv-2091-JCM-PAL

SUPPLEMENT TO OPPOSITION TO PLAINTIFFS' MOTION TO STRIKE DEFENDANT THE HERTZ CORPORATION'S JOINDER TO DEFENDANT FORD MOTOR COMPANY'S DISCLOSURE OF EXPERT WITNESSES

Defendant, *THE HERTZ CORPORATION*, by and through its attorney of record, Phillip R. Emerson, Esq. of the Law Offices of Emerson and Manke, PLLC and hereby submits the following Supplement to the Opposition to Plaintiffs' Motion to Strike

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Defendant The Hertz Corporation's Joinder to Defendant Ford Motor Company's Disclosure of Expert Witness.

HERTZ submits this Opposition following receipt of FORD MOTOR COMPANY'S Statement in Response to HERTZ'S Opposition to Plaintiffs' Motion to Strike Defendant THE HERTZ CORPORATION'S Joinder to Defendant FORD MOTOR COMPANY'S Disclosure of Expert Witnesses.

FORD MOTOR COMPANY is correct that to date, no expert fee sharing has occurred. In addition, the parties have not reached a formal agreement regarding fee sharing. Should the Court permit THE *HERTZ CORPORATION* to join in FORD'S Disclosure of Expert Witnesses, the parties would discuss a fee sharing arrangement. This would occur prior to trial. *THE HERTZ CORPORATION* did not intend to convey that fees had already been shared, and in fact, stated the fees would be shared **if** the matter proceeded to trial. Again, this would occur with the Court's approval and the parties' agreement. *THE HERTZ CORPORATION* provides this Supplement so there is no further confusion on this issue.

DATED this 20th day of December, 2011.

EMERSON & MANKE, PLLC

/s/ *Phillip R. Emerson*

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CERTIFICATE OF MAILING AND FACSIMILE

Pursuant to Nevada Rules of Civil Procedure 5(b), I hereby certify that service of the foregoing, SUPPLEMENT TO OPPOSITION TO PLAINTIFFS' MOTION TO STRIKE DEFENDANT THE HERTZ CORPORATION'S JOINDER TO DEFENDANT FORD MOTOR COMPANY'S DISCLOSURE OF EXPERT WITNESSES, was made this 20th day of December, 2011 via facsimile and by depositing a true and correct copy of the same for mailing, addressed as follows:

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/s/ Kayla Kitchen
An Employee of EMERSON & MANKE, PLLC

BROADCAST REPORT

TIME : 12/20/2011 15:44
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DATE	TIME	FAX NO./NAME	DURATION	PAGE(S)	RESULT	COMMENT
12/20	15:40	7373110	53	03	OK	ECM
12/20	15:42	13143158113	46	03	OK	ECM
12/20	15:43	7845252	53	03	OK	ECM

BUSY: BUSY/NO RESPONSE
NG : POOR LINE CONDITION
CV : COVERPAGE